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Attorneys for Defendant
NCR CORPORATION

UNITED STATES DISTRICT COURT

FOR THE SOUTHERN DISTRICT OF CALIFORNIA

GLEN R. HAGEN, Plaintiff, v. NCR CORPORATION, DOES 1 through 100, Defendants.	Case No.: 07 CV 2205 DMS (CAB) **(PROPOSED) STIPULATION ~~AND (PROPOSED) ORDER THEREON~~ CONTINUING EARLY NEUTRAL EVALUATION CONFERENCE**

TO THE HON. CATHY ANN BENCIVENGO, INTERESTED PARTIES and ATTORNEYS OF RECORD:

In connection with the above referenced matter, counsel for Plaintiff, Thomas R. Gill, Esq., of The Gill Group, A.P.C., and counsel for Defendant, Jason R. Dawson, Esq., of Gordon & Rees, LLP, have been discussing bases upon which a settlement might be predicated. We have made significant progress, but much remains to be done. We believe the latter can be accomplished by the end of February, 2008.

Counsel are available for a telephone conference to clarify anything Your Honor desires in connection with the above referenced. Counsel for Plaintiff would make the arrangements. His direct line is (858) 695-1377.

Therefore, IT IS HEREBY STIPULATED by and between the parties, pursuant to the agreements between Plaintiff, Glen R. Hagen, and Defendant, NCR Corporation, by and through counsel, as follows:

The Early Neutral Evaluation Conference [hereafter "ENEC"] may be continued for a period of approximately thirty (30) days to a date convenient to Your Honor's availability.

SO STIPULATED:

THE GILL GROUP, A.P.C.

Dated: January 17, 2008

By: ______________________
Thomas R. Gill, Esq.
Attorney for Plaintiff
GLEN R. HAGEN

GORDON & REES, LLP

Dated: January ____, 2008

By: ______________________
Jason R. Dawson, Esq.
Attorney for Defendant
NCR CORPORATION

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significant progress, but much remains to be done. We believe the latter can be accomplished by the end of February, 2008.

Counsel are available for a telephone conference to clarify anything Your Honor desires in connection with the above referenced. Counsel for Plaintiff would make the arrangements. His direct line is (858) 695-1377.

Therefore, IT IS HEREBY STIPULATED by and between the parties, pursuant to the agreements between Plaintiff, Glen R. Hagen, and Defendant, NCR Corporation, by and through counsel, as follows:

The Early Neutral Evaluation Conference [hereafter "ENEC"] may be continued for a period of approximately thirty (30) days to a date convenient to Your Honor's availability.

SO STIPULATED:

THE GILL GROUP, A.P.C.

Dated: January 17, 2008

By: ______________________
Thomas R. Gill, Esq.
Attorney for Plaintiff
GLEN R. HAGEN

GORDON & REES, LLP

Dated: ~~January~~ February 11, 2008

By: ______________________
Jason R. Dawson, Esq.
Attorney for Defendant
NCR CORPORATION

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UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF CALIFORNIA	COURT USE ONLY
ATTORNEY OR PARTY WITHOUT ATTORNEY (Name and Address): Telephone No. M.D. Scully (SBN: 135853) Tel: (619) 696-6700 Jason R. Dawson (SBN: 208906) Fax: (619) 696-7124 GORDON & REES LLP 101 West Broadway, Suite 1600 San Diego, CA 92101	
SHORT CASE TITLE GLEN R. HAGEN v. NCR CORPORATION	JUDGE: DEPT:
ATTORNEYS FOR DEFENDANT NCR CORPORATION	Court Case 07-CV-2205 DMS (CAB)

PROOF OF SERVICE

I, the undersigned, say: I am over 18 years of age, employed in the County of San Diego, California, in which the within-mentioned service occurred; and that I am not a party to the subject cause. My business address is 101 West Broadway, Suite 2000, San Diego, California 92101.

I hereby certify that on February 12, 2008, a copy of the foregoing documents listed below were filed electronically.

(PROPOSED) STIPULATION CONTINUING EARLY NEUTRAL EVALUATION CONFERENCE

Notice of this filing will be sent by operation of the Court's electronic filing system (ECF) to the following parties which are indicated on the electronic filing receipt.

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San Diego, CA 92121
Tel: 619-286-9393 / Fax: 858-695-1947
Attorneys for Plaintiff GLEN R. HAGEN

I declare that I am employed in the office of a member of the bar of this court whose direction the service was made.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on February 12, 2008.

Sharon Daubert

NCR/1048334/5365560v.1